

Message

From: Donaldson, Guy [Donaldson.Guy@epa.gov]
Sent: 2/26/2019 1:40:36 PM
To: Robinson, Jeffrey [Robinson.Jeffrey@epa.gov]; Stanton, MaryA [Stanton.Marya@epa.gov]; Verhalen, Frances [verhalen.frances@epa.gov]; Feldman, Michael [Feldman.Michael@epa.gov]
Subject: FW: Updates

Meant to send these to you guys as well.

From: Donaldson, Guy
Sent: Friday, February 22, 2019 3:38 PM
To: Stenger, Wren <stenger.wren@epa.gov>; Price, Lisa <Price.Lisa@epa.gov>
Subject: Updates

Just thinking of various things going on and trying to make sure I remembered

Staffing: I sent you a table of priority staff issues that I would like to discuss with you as soon is convenient for you.

Houston Bump up: TCEQ and Matt Kurylla met with Clint Woods earlier this week to push for more time in the comment period. TCEQ staff expects their managers will be reaching out to Anne and/or Erin to push as well. Texas wants more time to allow them to put exceptional events packages together for 4 days. Interestingly, I have been told that the days are from 2018 which is after the 2017 attainment year that the bump up is based. If we approved the four days in 2018, the area could request redesignation under the 2018 standard but it would still be subject to bump up to serious while the exceptional events and redesignation were processed.

Texas SSM withdrawal/SIP consistency: I spoke with Megan Bractyl. This was a follow up to a conversation with her where I told her you had concerns about having an ADD call where SIP consistency of withdrawing the SIP call was discussed. She said Anna Woods would be reaching out to you to discuss further. She reminded me that SIP consistency is the process by which the RA is delegated to take actions such as this that are outside the existing guidance (in this case the existing guidance is the SIP call). Under the delegation to the RA to take SIP actions, before the AA for Air can make a decision to support an RA in deviating from the guidance, the Region needs to give the opportunity for the Division Director's to weigh in. So we need to retrace our steps a little and go to the ADD to present issue. Since this is the process called for in the delegation, we don't want to get tripped up on procedural grounds down the road. If any ADDs object, we will record that and go back to the AA and inform him of the concerns.

Bella Vista Fire: I was out of the office but I understand that Arkansas thru David Gray had a lot of questions about whether they could move grant money or match money to deal with the fire clean up. Fran fielded these questions with the short answer being there isn't much flexibility. I understand David got what he needed but there may be further discussion.

Also, Arkansas has been talking to Jeff about whether they can use an Air Curtain Incinerator (ACI) for the clean up and can the ACI be exempted from permit requirement in an emergency. Jeff did some research. There is a provision that if the Governor declares an emergency an ACI can be located and operated for 8 weeks without a permit. The governor has declared an emergency. ADEQ, however, does not have delegation of the rules. So any decisions will have to be handled by EPA out of EN. The company will have to work with EN to insure it meets the requirements particularly if it wants to operate more than 8 weeks.

Evangeline Parish: I spoke to Gordon Reynolds of Cabot at some length today. He explained that not only have they not designed the controls, they haven't even chosen the technology they are going to use. I had thought that scrubbers were the only way to get at this but he said that they were considering other technologies but did not elaborate except to say that it would impact the flow rates and the temperature of the exhaust gas stream dramatically depending on

which way they go. He was not interested in trying to come up with generalized conservative parameters when they are required by the CD to provide a design to enforcement by June 20, 2020. I walked him through sanction and FIP implications and he did not seem worried. Mostly he feels like there will be enough time to develop a SIP before any negative sanctions actually occur. I told him that LDEQ is pretty strapped for resources so it will take some time to get SIP package pulled together after the design is done.

Have a good weekend.